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6 UNITED STATES DISTRICT COURT  
7  
8 DISTRICT OF NEVADA

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10 UNITED STATES OF AMERICA,	)	
	)	2:21-cr-00236-JAD-EJY-1
11 Plaintiff,	)	
	)	
12 v.	)	<b><u>STIPULATION TO CONTINUE</u></b>
	)	<b><u>MOTIONS DEADLINE ONLY</u></b>
13 HENRIETTA BINFORD,	)	(Ninth Request)
	)	
14 Defendant.	)	

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16 IT IS HEREBY STIPULATED by and between Jason M. Frierson, United States  
17 Attorney, as well as Christopher Burton and Steven W. Myhre, Assistant United States  
18 Attorneys, Counsel for the United States of America; and Angela H. Dows, Esq., counsel for  
19 Defendant HENRIETTA BINFORD, that the pretrial motions and notices of defense deadline be  
20 moved for approximately forty-five (45) days, to on or before October 5, 2023. The instant  
21 stipulation is not intended to request a continuance of the current calendar call and trial dates of  
22 December 11, 2023 and December 19, 2023, respectively.

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24 This is the ninth overall request for a continuance in this case, and the eighth request by  
25 instant counsel for Defendant HENRIETTA BINFORD. This Stipulation is entered into based  
26 upon the following:

- 27 1. That the parties request a continuance of the motions and notices of defense  
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1 deadline, which is currently set to expire on August 21, 2023.

- 2 2. The requested extension of the pretrial motions and notice of defense deadline  
3 from August 21, 2023 to October 5, 2023 is, in part, to allow for continued  
4 negotiation of the case, and the particular terms of the plea agreement, without  
5 providing details of negotiations thereon.
- 6 3. One additional aspect, in general terms, is the review of information as to the loss  
7 amount(s) and/or restitution amount(s) calculated and whether there were offsets  
8 or reductions that were not previously computed in said amount(s). This analysis  
9 requires additional investigation by defense counsel and an investigator.
- 10 4. That counsel for Defendant has conferred with her client, who does not object to  
11 the requested continuance.
- 12 5. That the additional time requested herein is not sought for purposes of delay, but  
13 merely to allow the parties sufficient time by which to investigate, research,  
14 respond and litigate any pretrial motions and/or defenses deemed necessary prior  
15 to trial.
- 16 6. The additional time requested by this stipulation does not request an extension of  
17 the time of trial. To the extent required, the additional time period requested to  
18 continue the matter serves the ends of justice and outweighs the best interest of  
19 the public and the defendant in a speedy trial pursuant to the Speedy Trial Act,  
20 specifically 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B).
- 21 7. Pursuant to 18 U.S.C. § 3161(h)(7)(B)(i) and (ii) denial of this request for  
22 continuance would result in a miscarriage of justice, as additional time is needed  
23 by which to effectively and thoroughly research and prepare for trial within the  
24 time limits established by 18 U.S.C. §3161, taking into account the exercise of  
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1 due diligence.

2 8. For all the above-stated reasons, the ends of justice would best be served by a  
3 continuance of the pretrial motions and notices of defense deadline.

4 DATED this 27th day of July, 2023.

5  
6 JASON M. FRIERSON  
United States Attorney  
7 By: /s/ Steven W. Myhre  
STEVEN W. MYHRE  
8 Assistant United States Attorney  
9 By: /s/ Justin Washburne  
JUSTIN WASHBURNE  
10 Assistant United States Attorney  
Counsel for Plaintiff

CORY READE DOWS & SHAFER  
By: /s/ Angela H. Dows  
ANGELA H. DOWS, ESQ.  
Appointed Counsel for Defendant  
Henrietta Binford

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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,	)	
	)	2:21-cr-00236-JAD-EJY-1
Plaintiff,	)	
	)	
v.	)	<b><u>FINDINGS OF FACT,</u></b>
	)	<b><u>CONCLUSIONS OF LAW, AND</u></b>
HENRIETTA BINFORD,	)	<b><u>ORDER THEREON</u></b>
	)	
Defendant.	)	
_____	)	

**FINDINGS OF FACT**

Based on the pending Stipulation of the parties, and good cause appearing therefore, the Court finds that:

1. Defense counsel requires a continuance of the motions and notices of defense deadline in order to review and research the case, including the review by one or more persons including hired investigator(s) in the case.
2. The parties also request additional time to effectively represent their clients in appropriately preparing the case for trial, however do not request an extension of the calendar call or trial dates at this time.
3. Defendant does not object to the continuance.

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**ORDER**

IT IS THEREFORE ORDERED that the parties shall have to and including October 5, 2023 within which to file any and all pretrial motions and notices of defense.

IT IS SO ORDERED.

Dated: August 1, 2023.

  
UNITED STATES DISTRICT JUDGE